



One Lincoln Center | Syracuse, NY 13202-1355 | bsk.com
600 Third Avenue | New York, NY 10016-1915 | bsk.com

STEPHEN A. DONATO, ESQ.
donatos@bsk.com

Syracuse
P: 315.218.8336
F: 315.218.8436

New York
P: 646.253.2351
F: 646.253.2301

July 24, 2024

VIA ELECTRONIC FILING

Honorable Wendy A. Kinsella
United States Bankruptcy Court
Northern District of New York
100 South Clinton Street
Syracuse, New York 13202

Re: *The Roman Catholic Diocese of Syracuse Chapter 11 Case No. 20-30663;*
Response to Supreme Court's Decision In Harrington v. Purdue Pharma L.P.

Dear Judge Kinsella:

I write on behalf of our client, The Roman Catholic Diocese of Syracuse, New York (the "Diocese") and the Official Committee of Unsecured Creditors (the "Committee").

The Diocese and the Committee have undertaken further review of the Joint Plan (as defined below), the disclosure statement and applicable developments in other cases in the context of addressing the impacts of the recent Supreme Court decision in *Harrington v. Purdue Pharma L.P.*, No. 23-124 (June 27, 2024) ("Purdue") and believe it is in the best interests of the process for the Diocese and Committee to amend their *Second Amended Joint Chapter 11 Plan of Reorganization for The Roman Catholic Diocese of Syracuse, New York* (the "Joint Plan") and the disclosure statement in support of the Joint Plan solely to address the treatment of non-debtor releases in light of the changes brought by the *Purdue* decision.

Therefore, the Diocese and the Committee have determined that we will not file a procedures motion, as the parties previously indicated, by the deadline of tomorrow, Thursday, July 25, 2024. Instead the Diocese and the Committee are in the process of revising the plan and disclosure statement to address the *Purdue* issue. We intend on filing the amended plan and disclosure statement with the Court during the week of August 12 but not later than August 19, 2024 with a request to schedule a hearing to approve the amended disclosure statement during the week of September 9, 2024. We believe that the plan and disclosure statement amendments will provide greater clarity

July 24, 2024
Page 2

and will allow the Court to move forward to plan confirmation in this case. We also request that the Court schedule a hearing to consider the amended disclosure statement during the week of September 9, which we believe will give the parties and the Court sufficient time, given the limited changes anticipated. If the amended disclosure statement is approved as a result of such a hearing, the Diocese and the Committee believe there will be sufficient time to resolicit all class 5 creditors while still maintaining the Court's confirmation hearing timeline, as scheduled, with a confirmation hearing to begin on November 4, 2024.

We will move forward with the preparation and filing of the amended plan and disclosure statement as noted above. The Diocese and the Committee are available to discuss any questions that the Court may have.

Thank you for your consideration.

Respectfully Submitted,

BOND, SCHOENECK & KING, PLLC



Stephen A. Donato

SAD/ta

cc: Robert T. Kugler, Esq. (via electronic mail)
Edwin H. Caldie, Esq. (via electronic mail)
Charles J. Sullivan, Esq. (via electronic mail)
Sara C. Temes, Esq. (via electronic mail)
Grayson T. Walter, Esq. (via electronic mail)